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10 Attorneys for Plaintiff
11 WORLD FUEL SERVICES (SINGAPORE) PTE
12 LTD.

13 UNITED STATES DISTRICT COURT
14
15 NORTHERN DISTRICT OF CALIFORNIA

16 WORLD FUEL SERVICES
17 (SINGAPORE) PTE LTD.,

18 Plaintiff,

19 v.

20 ZHONG XIN PEARL M/V, IMO Number
21 9684134, *in rem*,

22 Defendant.

IN ADMIRALTY

Case No. 3:20-cv-07423-JCS

**PLAINTIFF'S RESPONSE TO ORDER TO
SHOW CAUSE**

23 Pursuant to this Court's Order to Show Cause, Dkt. No. 8, Plaintiff responds as follows:

24 Plaintiff thanks the Court for its Order to Show Cause noting the absence of Mr. Toney's
25 Declaration from the Court's docket.

26 1. The Declaration of Robert Toney has now been filed as Dkt. No. 9.

27 2. As to the Court's authority to enter an order allowing cargo handling operations to
28 continue and for movement of the vessel, the court has inherent authority to control proceedings
before the Court, including the authority to control the holding and disposition of any res held by
the Court, and its equitable powers to ameliorate any harm caused by the judicially authorized
prejudgment attachment of property. If the event the Court disagrees, Plaintiff withdraws its
Motion for Order Allowing Cargo Handling and Movement of Vessel, and is submitting to the

1 Court a revised form of Warrant of Arrest without references to any Order Allowing Cargo
2 Handling and Vessel Movement.

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4 Dated: October 23, 2020

MILLER NASH GRAHAM & DUNN LLP

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6 By: /s/ Phillip Allan Trajan Perez

7 Phillip Allan Trajan Perez
8 Tyler D. Bowlin
9 Attorneys for Plaintiff
10 WORLD FUEL SERVICES
11 (SINGAPORE) PTE LTD.
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